

IN THE UNITED STATES DISTRICT  
COURT FOR THE MIDDLE DISTRICT OF  
ALABAMA RECEIVED

Courtney Boyd

2006 NOV 27 A 10:23

Plaintiff

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

v.s.

Dr. Dardane et al. )

Defendants. )

Case No. 2:06CV-511-20KZD

MOTION FOR GOOD CAUSE SHOWN

Comes Now, The Plaintiff Courtney Boyd, makes into  
the Honorable Court Pursuant to Rule 36(a) and 405 Fed.R.  
C.V. Proc. The Plaintiff Submits the following in support of the  
Motion:

1. Rule 36(a) A party may serve upon any other party a written request for admission for purposes of the pending action ONLY, of the truth of any matters within the scope of Rule 36(c) set forth in the request that relate to statement or opinions of fact or the application of law to fact, including the genuineness of any document described in the request.

Like Rule 405. Method of proving Character: In all Cases in which evidence of character or a trait of character of a person, admissibly, proof may be made by testimony as to reputation or by testimony in the form of an opinion.

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Page 1

3. The Plaintiff request for the Defendants to answer the following Question within (30) days of receiving this Motion:

1. Each Defendant to listed their full ~~name~~ and age?

A.

2. Each Defendant to stated where they are married or if they are single?

A.

3. Each Defendants to state where not they have any Children if over under 18 years please state how many and their age?

A.

4. Each Defendant to stated the County which they live, Once how long have they been a resident of the state of Alabama?

A.

5. Each Defendant to list and produce a copy of their Motor license, including any Spec. or Classes they have been in?

A.

b. Each Defendant to state how long they have been employed by Plaintiff Health Service?

A.

7. Defendant Kay Wilson to answer where or not did Dr. Darboze ever tell her that he did not take the plaintiff back brace? Did the Plaintiff ever wrote you asking you to get Dr. Darboze to give him his brace?

A.

8. Defendant Tom Darboze to answer. Did we ever tell Kay Wilson that the Plaintiff gave up his back brace? Is it standard for a Doctor to keep give someone Medication, if he feel that there nothing wrong with him?

A.

9. Defendant Cynthia Remmels to answer. Did you not see the Plaintiff on 6-11-06, after he was taken to the HCU by the Officers and inmate on the stretcher, because his entire lower body had gone out? Is it standard for a nurse to tell an inmate to sign up for sick call, when they get on call saying his entire lower body and lower back has gone out?

10. The Plaintiff will ask these questions at the hearing of this case, and he request that the defendant answer those questions under oath. The Plaintiff some of these questions to get a better understanding of the Methods and Characters. To serve these questions it demand the Plaintiff to be present for the hearing of this case. The Plaintiff request for discovery, to see how the Defendant lawyer think that the Plaintiff have this information but he does not, so therefore he need these question answers. Answering these questions will not do in ~~any~~ no way hurt the Defendant, but ~~any~~ if the Defendant does not answer these questions, I will hurt the Plaintiff and his case.

Wherefore, The Plaintiff prays that the Defendants will answer these questions within ~~(20)~~ days of receiving them. Because these will be used at the hearing of this case.

Court By

Cert. & Code of Serv. CC

I hereby Certify that I have served a copy of the foregoing upon the Defendants Counsel by placing it into fastening cert. fac. No. 1 b6 on NOV. 21 2006.

Court By

Plat 5

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